

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC**

In the Matter of)	
)	
Revision of the Commission's Rules)	CC Docket No. 94-102
To Ensure Compatibility with)	
Enhanced 911 Emergency Call Systems)	

**Comments in Support of Petition for Reconsideration of the
Cellular Telecommunications & Internet Association**

Motorola submits these comments in support of the Petition for Reconsideration of the Cellular Telecommunications & Internet Association ("CTIA") of the *Fourth Report and Order* in this proceeding.¹ The *Fourth Report & Order* addressed TTY/digital compatibility and established June 30, 2002 as the deadline for wireless service providers to complete implementation in the networks and handsets of the capability of transmitting 911 calls made using TTY devices. Motorola is engaged in an intensive effort to meet this deadline for all its carrier customers so that the carriers can achieve complete timely deployment.

¹ *In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Fourth Report and Order, FCC 00-436 (rel. December 14, 2000) ("*Fourth Report and Order*").

In response to new issues raised by disabilities groups² the FCC “directs the industry, through the TTY Forum, to investigate these issues and to work towards necessary solutions.”³ The issues raised are E911 solutions for proprietary enhanced communication protocols. Because Motorola is concerned that the FCC has raised a new requirement for the wireless industry beyond meeting the deadline to implement Baudot 45.45 compatibility by June 30, 2002 in the *Fourth Report and Order*, Motorola supports CTIA’s request for reconsideration and clarification.

The very reason that the TTY Forum participants agreed to develop compatibility for Baudot 45.45 was that it is the common *de facto* TTY standard. As noted by CTIA in its petition, TTY manufacturers assured the Forum that TTY devices with proprietary enhanced protocols were all capable of defaulting to 45.45 Baudot. This is the reason why manufacturers of wireless devices have developed solutions and expedited the standards process in the wireless telecommunications industry for Baudot 45.45 TTY/digital compatibility.

There are multiple proprietary protocols for TTY. Development of compatibility solutions for other proprietary protocols would discourage TTY harmonization and compatibility. It would also be fundamentally at odds with the regulations adopted by the FCC for implementing Section 255. The FCC correctly determined that “accessibility” would best be provided if “telecommunications equipment and customer premises equipment shall pass through cross-manufacturer, non-proprietary, industry standard

² *Fourth Report and Order* at para.19.

³ *Fourth Report and Order* at para. 21.

codes, translation protocols, formats or other information necessary to provide telecommunications in an accessible format, if readily achievable.”⁴

Rather than encourage solutions that work against harmonization and compatibility, the FCC should encourage TTY manufacturers to design their TTY products so that they always revert to the common de facto standard of 45.45 Baudot. Other alternatives for the TTY industry going forward include designing TTYs that use common telecommunications protocols.

Therefore, Motorola supports the CTIA request that the Commission reconsider its directive concerning digital wireless networks having the capability of supporting proprietary enhanced TTY protocols in emergency communications.

Respectfully submitted,

Mary E. Brooner
Director, Telecommunications Strategy
& Regulation
Global Government Relations Office
Motorola
1350 Eye Street, NW Suite 400
Washington, DC 20005
202/371-6900

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⁴ 47 C.F.R. Section 6.9 (1999).